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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

Consolidated Case No. 3:20-cv-08570-JD

Hon. James Donato

**DECLARATION OF AMANDA F.
LAWRENCE IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

1 I, Amanda F. Lawrence, declare and state as follows:

2 1. I am a member of the law firm Scott+Scott Attorneys at Law LLP, counsel for the
3 Advertiser Plaintiffs, and have been admitted *pro hac vice* in the above-captioned matter. I have
4 personal knowledge of the facts set forth in this declaration and, if called as a witness, could and
5 would testify competently to such facts under oath.

6 2. Pursuant to Civil Local Rules 7-11 and 79-5(f), I submit this declaration in support
7 of Plaintiffs' concurrently-filed Administrative Motion to Consider Whether Another Party's
8 Materials Should Be Sealed.

9 3. Certain documents and information referenced in the discovery dispute letter have
10 been designated by Defendant Meta Platforms, Inc. ("Meta Platforms") as "Confidential" or "Highly
11 Confidential" under the Stipulated Protective Order (ECF No. 314).

12 4. Portions of the discovery dispute letter referencing or reflecting the contents of the
13 documents and information designated by Meta Platforms as "Confidential" or "Highly
14 Confidential" have been redacted from the publicly filed version of the letter. *See* Civil L.R. 79-
15 5(e)(1).

16 5. An unredacted version of the discovery dispute letter with these references
17 highlighted is filed herewith. *See* Civil L.R. 79-5(e)(2), (f)(1).

18 6. Plaintiffs' request is limited to documents and information produced by Meta
19 Platforms marked Confidential or Highly Confidential, or information directly reflecting documents
20 and information produced by Meta Platforms marked Confidential or Highly Confidential. This
21 request is thus narrowly tailored to seek sealing only of potentially sealable material.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed on April 18, 2023, in New York, New York.

24 s/
25 Amanda F. Lawrence
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